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Attorney for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: : CHAPTER 13

Ramon Soriano & Ines M. Soriano : CASE NO. 16-26865

Debtor : HONORABLE JOHN K. SHERWOOD

ATTORNEY'S RESPONSE TO NOTICE OF MOTION TO DISMISS PETITION

I, Russell L. Low, Esq. hereby certify the following:

1. I, Russell L. Low, Esq. represent the debtor Ramon Soriano & Ines M. Soriano in this bankruptcy proceeding.
2. On November 20, 2020 a Notice of Motion to Dismiss Petition was entered due to failing to obtain court authorization to obtain refinancing .
3. At this time, the debtor's counsel is waiting on the refinance documents from the title company to file a motion to approve refinance.

Date: January 7, 2021

/s/ Russell L. Low
Russell L. Low, Esq.
Attorney for Debtor